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9 *Designated solely for service pursuant to LR IA 11-1(b)*

10 *Attorneys for Plaintiff Smart Rain Systems, LLC*

11 **UNITED STATES DISTRICT COURT**

12 **IN AND FOR THE DISTRICT OF NEVADA**

13
14 SMART RAIN SYSTEMS, LLC,

15 Plaintiff,

16 vs.

17 ROHREN – UND PUMPENWERK BAUER
18 GES M.B.H., and BAUER NORTH
19 AMERICA, INC.,

20 Defendants.

Case No. 2:22-cv-00232-CDS-EJY

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND THE DEADLINE
TO RESPOND TO THE COMPLAINT**

(FIFTH REQUEST)

21
22 IT IS HEREBY STIPULATED AND AGREED, by Plaintiff Smart Rain Systems, LLC
23 (“Smart Rain”), and Defendant Bauer North America, Inc. (“Bauer NA”), Defendant Rohren -
24 und Pumpenwerk Bauer Ges.m.b.H. (“Bauer GmbH”) (collectively, “Bauer”), through their
25 respective counsel, that the time for Bauer to respond to the Complaint be extended up to and
26 including December 7, 2022. Bauer’s current deadline to respond to the Complaint is November
27

7, 2022. Since the parties' fourth stipulation to extend the deadline for responding to the complaint, Plaintiff retained new counsel to represent it in this matter, who is getting up to speed and has communicated with counsel for Defendants about resolving this matter. The additional thirty days stipulated to herein will allow the parties additional time to explore a potential early resolution of the claims in this case.

The reason for the extension is not for purposes of delay or to cause prejudice to any party, but to allow the parties to continue to discuss settlement options. This is the parties' fifth request for such an extension from the Court, having had previous extensions granted on June 3, 2022 [Docket 17], August 4, 2022 [Docket 19], September 7, 2022 [Docket 21] and October 5, 2022 [Docket 25]. This request complies with Local Rules IA 6-1, IA 6-2, and 7-1.

DATED this 4th day of November, 2022.

RAY QUINNEY & NEBEKER P.C.

EVANS FEARS & SCHUTTERT LLP

/s/ Z. Ryan Pahnke

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Nevada Bar No. 9641
Attorney for Plaintiff

David J. Malley
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/s/ Chad R. Fears

(signed electronically by filing attorney with permission received via email)

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IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Dated: November 4, 2022